

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FULTON COUNTY EMPLOYEES'  
RETIREMENT SYSTEM, Derivatively on Behalf  
of THE GOLDMAN SACHS GROUP, INC.,

Plaintiff,

v.

LLOYD BLANKFEIN, DAVID M. SOLOMON,  
M. MICHELE BURNS, DREW G. FAUST,  
MARK A. FLAHERTY, WILLIAM W. GEORGE,  
JAMES A. JOHNSON, ELLEN J. KULLMAN,  
LAKSHMI N. MITTAL, ADEBAYO O.  
OGUNLESI, PETER OPPENHEIMER, JAN E.  
TIGHE, DAVID A. VINIAR, and MARK O.  
WINKELMAN,

Defendants,

and

THE GOLDMAN SACHS GROUP, INC.,

Nominal Defendant.

Case No.: 1:19-cv-01562 (VSB)

**STIPULATION AND  
[PROPOSED] ORDER**

WHEREAS, on February 19, 2019, Plaintiff Fulton County Employees' Retirement System filed a Verified Shareholder Derivative Complaint ("Complaint") in the above-captioned action;

WHEREAS, on March 15, 2019, this Court so ordered the parties' Stipulation permitting Defendants to serve and file a motion to dismiss the Complaint on or before May 13, 2019, Plaintiff to serve and file its opposition to Defendants' motion up to 60 days from service of the motion, and Defendants to serve and file a reply memorandum in support of their motion up to 45 days from service of Plaintiff's opposition;

WHEREAS, on May 8, 2019, this Court granted Defendants' letter motion seeking leave to file a memorandum supporting Defendants' motion to dismiss the Complaint jointly on behalf of all Defendants of no more than 35 pages, for Plaintiff's opposition to be limited to 35 pages, and for Defendants' joint reply memorandum to be limited to 15 pages;

WHEREAS, on May 13, 2019, Defendants moved to dismiss the Complaint; and

WHEREAS, after Defendants filed their motion, Plaintiff notified Defendants that it intends to amend the Complaint (“Amended Complaint”) pursuant to Federal Rule of Civil Procedure 15(a)(1).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

1. Plaintiff will serve and file the Amended Complaint on or before July 8, 2019.
2. Defendants will have up to 60 days from the filing of the Amended Complaint to answer or move to dismiss the Amended Complaint. If Defendants move to dismiss the Amended Complaint (the “Dismissal Motion”), Defendants’ joint memorandum in support of the Dismissal Motion shall be a single brief not exceeding 35 pages.
3. Plaintiff will have up to 60 days from the filing of the Dismissal Motion to serve and file its opposition memorandum, which will not exceed 35 pages.
4. Defendants will have up to 45 days from the filing of Plaintiff’s opposition memorandum to serve and file their joint reply memorandum, which will not exceed 15 pages.

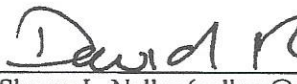
Dated: May 31, 2019  
New York, New York



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Employees' Retirement System*



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Oppenheimer, David A. Viniar, and Mark O. Winkelman,  
and Nominal Defendant The Goldman Sachs Group, Inc.*

DATED: \_\_\_\_\_

SO ORDERED,

\_\_\_\_\_  
Hon. Vernon S. Broderick  
United States District Judge